

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 20-30033-MGM
)	
(1) ANTONIO STRONG, also known as)	
"T-Glo," "Tony Glo," "Tonio," "Antonio)	
Strom," "Michael Starkman," "Richard)	
O'Malley," "Michael Lee," "Mark Daniels,")	
"Sergio Parker," "Michael Leary," "Charles)	
Gaut," "Darren Geiger," "Stan Smith," and)	
"Tyson Kocher,")	
)	
(2) HERBERT WRIGHT III, also known)	
as "Herb," "Lil Herb," "G Herbo," and)	
"Herbert Light,")	
)	
(3) JOSEPH WILLIAMS, also known as)	
"Joe Rodeo," "Rockstar Rodie," and "Rodie,")	
)	
(4) STEVEN HAYES, JR.,)	
)	
(5) DEMARIO SORRELLS, also known)	
as "Jonte" and "Johntay," and)	
)	
(6) TERRENCE BENDER, also known as)	
"Blends" and "Dopeblends,")	
)	
Defendants.)	

GOVERNMENT'S STATUS REPORT

The United States of America, by Andrew E. Lelling, United States Attorney for the District of Massachusetts and Assistant United States Attorney Steven H. Breslow and Trial Attorney Andrew R. Tyler of the U.S. Department of Justice in the Criminal Division, Fraud Section (the "Government") hereby files the instant Status Report pursuant to Local Rule 116.5(a).

1. The Government has provided defense counsel with certain key discovery documents since their respective arraignments, including:

- a. Grand Jury exhibits and testimony;
- b. Search warrant applications, affidavits, and warrants.
- c. Reports of interviews of the defendants.
- d. Miscellaneous text messages and other communications by the defendants.
- e. Certain records of third-parties, such as banks and victim businesses.

2. The Government has also provided counsel for Mr. Strong and Mr. Wright with digital evidence of devices seized from their respective clients: three phones and a laptop from Mr. Strong, and two phones from Mr. Wright. Defense counsel for Mr. Strong and Mr. Wright are reviewing this evidence and will provide the Government with a recommendation about disclosure to the remaining defense counsel.

3. Pursuant to Fed. R. Crim. Pro 16.1, the Government has also conducted several group conferences with counsel concerning the nature, scope, means, and timing of discovery.

4. On August 4, 2021, the Government informed the defense that it had completed its digital processing of the discovery, which consisted of approximately 108,335 documents totaling 116 GB and an additional 41 compound files (which are not individuals files, but rather large, stand-alone productions consisting primarily of social media search warrants and hard drives) totaling 120 GB. The Government provided the defense with a detailed spreadsheet that identified the files by Bates-number, name, file type, path (*e.g.*, Grand Jury / Responses, Grand Jury / Exhibits, etc.), number of pages, and other file information. The Government requested a discovery conference with the defense, which has not yet occurred. (D.107).

5. On September 3, 2021, the Government informed defense counsel that the first round of discovery, which consisted of all of the numerous Grand Jury subpoena responses, exhibits, and testimony, required a 32 GB flash drive. Upon receipt of the flash drives, the

Government will provide the defense with bates-labeled copies of these materials.

6. On August 3, 2021, the Court excluded the period from December 7, 2020 until August 5, 2021 from the Speedy Trial Clock. (D.106). On August 10, 2021, the Court excluded the period from August 5, 2021 to September 8, 2021 from the Speedy Trial Clock. (D.111). As of September 8, 2021, no zero days will have run on the Speedy Trial Clock.

7. The Government requests another status conference on or about November 5, 2021, by which time the Government expects to have provided defense counsel with substantially all of the remaining discovery, including search warrants, search warrant responses, law enforcement reports, and witness statements.

8. The Government does not currently anticipate providing discovery as a result of its future receipt of information, documents, or reports of examinations or tests, except that it expects to receive additional records from victims pursuant to Trial Subpoenas related to the instant Indictment and, to a lesser extent, Grand Jury subpoenas concerning other offenses and/or subjects under investigation.

9. The parties agree that it is premature for a motion date to be established under Fed.R.Crim.P. 12(b) or a schedule for the timing of expert witness disclosures.

10. The parties have engaged in preliminary plea negotiations, but it is premature to determine whether this case will be resolved with guilty plea(s). The Government expects that a trial will last approximately four weeks.

11. The parties jointly request a continuance for the period from September 8, 2021 (the date of the most recent status conference) to the date of the next scheduled status conference, and state that this period should be excluded pursuant to Local Rule 112.2 and 18 U.S.C. § 3161(h)(7)(A), to permit the defense to (a) review the voluminous discovery; (b) investigate the

evidence and possible defenses; (c) develop its own discovery; (d) evaluate the need for, and to prepare, discovery requests and/or pre-trial motions; and (e) engage in plea negotiations with the Government, all of which provide the basis for the Court to find that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

Respectfully submitted,

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United States Attorney

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Dated: September 8, 2021

Certificate of Service

I hereby certify that this document filed under seal will be sent by e-mail to the registered participants as identified on the Notice of Electronic Filing.

By: /s/ Steven H. Breslow
STEVEN H. BRESLOW
Assistant U.S. Attorney